

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.
AHMAD BECOATE

FILED
OCT 16 2018 CRIMINAL NO. 18-291-01
By _____
KATE BARKMAN, Clerk
Dep. Clerk

**CONSENT PROTECTIVE ORDER FOR
DISCLOSURE OF DISCOVERY MATERIALS**

This matter having been opened to the Court by the United States and the defendant in connection with the production of discovery in this case, and the government having agreed to provide subject to a protective order certain discovery information that contains personal identifying information and/or could otherwise be used to identify or intimidate witnesses, and the defendant having agreed to the entry of a protective order covering certain discovery materials to be produced in this case, and it appearing that the materials to be covered by the order, if disseminated without the protection of such an order, could cause harm to a person or persons, and good cause having been shown,

AND NOW, this 15th day of October, 2018, it is hereby ORDERED that:

- a. The government shall mark, or otherwise designate, any materials that it wishes to have covered by this Order as "confidential" or

“protected.” Such marked or designated material shall be subject to this protective order.

b. Those materials may be provided to counsel for defendant by the government.

c. Defendant’s counsel may make the designated materials produced under this protective order available for review by the defendant under such circumstances as to ensure that the defendant cannot make any copy of any portion of such designated materials.

d. Defense counsel shall not reproduce any portions of the materials covered by this protective order, shall not permit other persons to copy the materials covered by this protective order, and shall not disseminate copies of the materials covered by this protective order, except that counsel may make any copies necessary for his work on the defense of this matter and may provide copies to his staff and to third parties, such as translators or other experts, as may be necessary for their work on the defense of this matter, provided that, if counsel does so, counsel shall provide such persons with a copy of this protective order, shall advise such persons that such materials are not to be further copied or disseminated, and shall have such persons return to counsel all copies of such materials as soon as reasonably practical.

e. In accordance with the requirement under Rule 1.15 of the Pennsylvania Rules of Professional Conduct that counsel retain discovery for five years after the conclusion of the case, at the end of that five-year period, defense counsel shall either

(i) return to the government all material covered by this protective order; or
(ii) destroy all material covered by this protective order and send to counsel for the government a written representation that such materials have been destroyed.

f. This order may be revised by the Court at any time. Nothing in this order will preclude the defendant upon proper motion from seeking any additional discovery from the government, from challenging the inclusion of particular discovery materials under this protective order, or

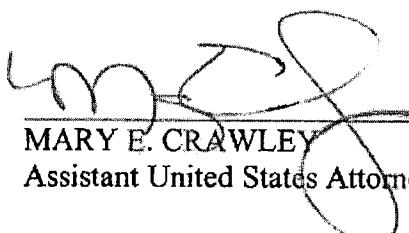
from conducting any independent investigation. Nothing in this order shall grant the defendant any additional right to obtain access to materials in the possession of the government.

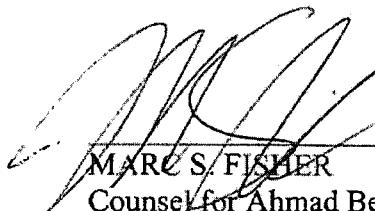
BY THE COURT:


HONORABLE JOSEPH F. LEESON, JR.
Judge, United States District Court

The foregoing Protective Order is hereby agreed to by me.

WILLIAM T. McSWAIN
United States Attorney


MARY E. CRAWLEY
Assistant United States Attorney


MARC S. FISHER
Counsel for Ahmad Becoate